

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT TACOMA

CYNTHIA FAJARDO,

Plaintiff,

vs.

PIERCE COUNTY, a political subdivision of
the State of Washington; and PIERCE
COUNTY SHERIFF'S DEPARTMENT, a
department of Pierce County,

Defendants.

NO. C08-5136 RBL

STIPULATED PROTECTIVE ORDER
CONCERNING IME RECORDS

THIS MATTER comes before the court upon the agreement of counsel. By their execution of this Stipulated Protective Order, the parties have agreed as follows:

1. All copyrighted material contained with the IME discovery shall be kept confidential by the discovering party, provided that the party may disclose the documents to experts, consultants, and witnesses, as necessary, in order to prepare for trial of this matter. The copyrighted material at issue is at pages 7546, 7547, and 7548 of the discovery. This material consists of: (1) a questionnaire with 21 groups of statements; and (2) a questionnaire concerning 21 common symptoms of anxiety.

1 2. This order in no way affects the right of a party to use documents subject to
2 this order at trial (including pretrial proceedings), or on appeal therefrom, provided that the
3 appropriate evidentiary basis can be established.
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5 3. At the conclusion of this litigation and any appeals therefrom, any and all
6 copies of the documents shall be destroyed.
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8 4. The parties agree that this order is entered without prejudice, and that at any
9 time while this action is pending, any party may move the court for relief from this protective
10 order and/or amendment of the terms of this order for good cause shown.
11

12 DATED this 26th day of May, 2009.
13

14 GERALD A. HORNE
15 Prosecuting Attorney
16


17 BRESKIN, JOHNSON & TOWNSEND
18

19 /s/ _____
20 DONNA Y. MASUMOTO
21 Deputy Prosecuting Attorney
22 Attorney for Defendants
23 WSBA #19700
24

25 /s/ _____
 DAVID E. BRESKIN
 Attorney for Plaintiff
 WSBA #10607

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IT IS HEREBY ORDERED that the parties adhere to the terms set forth above as if fully set forth herein.


RONALD B. LEIGHTON
UNITED STATES DISTRICT JUDGE

Approved as to Form, Notice of
Presentation Waived:

BRESKIN, JOHNSON & TOWNSEND

/s/ _____
DAVID E. BRESKIN
 Attorney for Plaintiff
 WSBA #10607